

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NOEL JACKSON GUZMAN,

Plaintiff,

-against-

P.O. BRIAN JAY,

Defendant.

**DECLARATION OF
JON L. NORINSBERG**

10 CV 6353 (ALC) (JCF)

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JON L. NORINSBERG, an attorney duly admitted to practice in the State of New York and in this Court, declares under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the attorney for plaintiff in the above civil rights action brought pursuant to 42 U.S.C. § 1983. As such, I am familiar with the facts stated below and submit this Declaration to place the relevant information and documents on the record in opposition to defendant's motion for mistrial and sanctions.
2. Attached as **Exhibit A** is a copy of the Verdict Form.
3. Attached as **Exhibit B** is a copy of relevant portions of the deposition transcript of non-party witness Jose Carbajal.
4. Attached as **Exhibit C** is a copy of the invoice of Rameesh Gidumal, M.D., showing a bill for \$10,000.00 for his anticipated testimony at trial in the Stanczyk matter.
5. Attached as **Exhibit D** is a copy of plaintiff's medical records from Columbia Presbyterian Medical Center.

6. Attached as **Exhibit E** is a copy of plaintiff's medical records from Harlem Hospital Medical Center.

7. Attached as **Exhibit F** is a copy of photographs of plaintiff's injury showing visible bruise marks where P.O. Jay's boot made contact with plaintiff's leg.

8. Attached as **Exhibit G** is a copy of plaintiff's medical records from NY Presbyterian Hospital.

9. Attached as **Exhibit H** is a copy of the Nerve Conduction Velocity (NCV) test report.

10. Attached as **Exhibit I** is a copy of the Life Expectancy Table, from the National Statistics Report by US Department of Health and Human Services, Volume 62, Number 7.

Respectfully submitted,

By: 

JON L. NORINSBERG (norinsberg@aol.com)
Attorney for Plaintiff
225 Broadway, Suite 2700
New York, NY 10007
(212) 791-5396

TO: Assistant Corporation Counsel
New York City Law Department
Special Federal Litigation Division
100 Church Street
New York, New York 10007
Morgan D. Kunz, Esq.
Matthew J. Modafferi, Esq.